

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PAULINO ESPINOBARROS (A.K.A
PABLO), *individually and on behalf of others
similarly situated,*

Plaintiff,

-against-

FIRST & FIRST FINEST DELI CORP. (d/b/a
FIRST & FIRST FINEST DELI) and ALI
KAREEM

Defendants.

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**Index No. 17-cv-5587
(KPF)**

**NOTICE OF MOTION
TO AMEND COMPLAINT**

TO:

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Attorney for Defendants

PLEASE TAKE NOTICE that, upon the annexed Declaration of Joshua S. Androphy, dated February 14, 2018, the accompanying Memorandum of Law dated February 14, 2018, and all the papers and proceedings had herein, Plaintiff will move this Court, before the Honorable Katherine Polk Failla, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, Courtroom 618, on a date to be determined by the Court, for leave, pursuant to Rule 15 of the Federal Rules of Civil Procedure, to file an Amended Complaint in this matter.

Please take further notice that pursuant to Local Civil Rule 6.1(b), any opposing affidavits or memoranda are due within fourteen days after service of the motion papers.

Dated: New York, New York
February 14, 2018

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/Joshua S. Androphy
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